

information said that we were to cure any problems with blanketing interference within the blanketing contour at no expense to the person, and that we had to provide technical advice to those who were experiencing blanketing interference outside the blanketing contour. A table in Mrs. Raines' information showed that our blanketing contour was about 2.45 miles from the antenna site. That information told us that we were not responsible for curing any problems experienced by those who had boosters and preamplifiers, which, because of the terrible TV reception, are quite popular here in Poplar Bluff. We also knew from Mrs. Raines material that we were not responsible for problems caused in non-RF devices such as VCRs, telephones, etc. We had also been told by our consulting engineer, Kevin Fisher, and our communications counsel, that KOKS was not responsible for curing interference to channel 6, WSPD-TV, Paducah, Kentucky. We were not responsible because channel 6 broadcasts from so far away that Poplar Bluff is far beyond the station's grade B or protected contour. We were told that very little signal from channel 6 actually got to Poplar Bluff anyway. I spoke to Mrs. Karen Raines three or four times during late 1988 and early 1989. She never told me directly that KOKS was not responsible for interference to channel 6, but I told her several times that many of the complaints we received were only concerning channel 6, and that we had no responsibility to cure interference to channel 6, and she did not tell me that I was wrong. We even made that point in several of our written submissions, and included a map of the channel 6 coverage area

taken from the Commission's files. I spoke with Mrs. Raines a few times after this submission but she did not contradict or correct me. We even received a copy of a letter in December, 1989, from WSPD-TV, in which they said that they had no legal rights in the KOKS matter because of the geographical limits of its coverage. A copy of that letter is attached to my testimony as Attachment B.

9. In November, 1988 I started making calls to people to find out what their problem was and to make appointments to come to their homes to correct the problem, if possible. I asked people to describe their problem and in almost every instance the person complained about interference to channel 6. I asked if the person had a booster or pre-amplifier. I asked what interference they were receiving on other channels, but most complaints concerned channel 6. If people complained only about interference to channel 6, or had a booster or pre-amplifier, I told that person about the filters they might use to improve reception. We were, I thought, not responsible for curing interference to channel 6 reception or to those with boosters, and we had other complaints to resolve. I tried to make appointments to visit the homes of people who complained of interference to a channel other than channel 6 and who didn't have a booster. Some mentioned problems with their VCRs. Almost no one either in the first telephone call or in a subsequent home visit mentioned interference to other devices such as radios. The Hillis' mentioned interference to their tape player and radio when we visited the Hillis home in 1989. Nothing was

done then to correct the problem. Mrs. Mary Wynn also complained of interference to her radio. A choke filter was installed on the cord to her radio and that seemed to solve the problem. Mrs. Betty Anderson was another person who complained about interference to her radio when we visited her home in 1989 or 1990. She also complained about the door bell. The interference was really coming from the doorbell, so we disconnected the doorbell and put filters on both her television and the radio next to her bed. Mrs. Joanne Gray, when we visited her house, also complained about problems with her radio. When we checked the radio we discovered that the whole AM portion of the radio band didn't work, although the FM band did. I told Mrs. Gray that we couldn't do anything for that. I talked to Mr. Lampe about that later and he said there's nothing we can do for a broken radio.

10. I knew that the blanketing contour was about 2.5 miles from the station. To determine if a person was within the blanketing contour or not I just had to guess as best I could based on that person's directions to their house and their estimate of how far their home was from the antenna site. I did not use a map, and could not use a map because in our largely rural area there are no street references to go by. I did the best I could to determine who was within and who was outside the contour. Sometimes I made mistakes. For example, when the Ellis' called I thought from their description of their location and the directions they gave to the house that they were six to eight miles away from the station. I

have since found out that the Ellis live within the blanketing contour. In response to the FCC's request, I tried to locate the complainants' homes on a map filed with the FCC in September, 1989.

11. In scheduling appointments with people with complaints I had only one person, a volunteer named Lillian Shavely, to help me, and it was an extremely time-consuming and aggravating task. The station did not have the resources to hire more people to help us. Throughout this ordeal we have had to rely almost entirely on myself and Mr. Stewart, and only one or two volunteers. Not everyone was courteous or nice to me on the phone, so I didn't feel I could ask people to volunteer for that kind of duty. Many people I called many, many times before I was able to reach them. I also asked the person if they had a booster or pre-amplifier. Kevin Fisher told us about the possibility of using string filters to reduce or eliminate the interference, and Mr. Abernathy designed some for our use. We also found that an FM notch filter, a 75 ohm filter, or 0-75, often worked to decrease interference from whatever source. Those people I called who said they had a booster were exempt in that we did not have a responsibility to owners of boosters. I did tell these people, however, of the possibility that their problem could be cured by the installation of a simple filter. People who called who complained only of interference to TV channel 6 I told about the 0-75 ohm filter. I went to the homes of other complainants and installed the sting filters. I carried a small bag of equipment with me, including a screw driver and

other simple tools. I didn't have, and didn't install any antenna lead wire or coaxial cable. I don't have a technical background, but Mr. Abernathy showed me how to install the filters, which are pretty easy to use anyway. The string filters we installed generally improved reception on channel 8, but did very little to cure the problem with 6. After we had gone to a few of the homes we discovered about the 0-75 filter, which was successful, in many instances, in curing interference on both channels (6 and 8), and almost always worked to cure problems on channel 8. These filters are fairly easy to install, and I was shown how by the fellow who runs our Radio Shack. Now I wish we had involved Mr. Lampe in this from the beginning. With the number of complaints we had, however, I just did not believe that the station had the resources to hire a professional, and tried to do the work myself.

12. In January of 1989 a lawsuit was filed in our local court claiming that KOKS had taken away their broadcast rights and seeking unspecified damages. The plaintiffs were the Smiths; Randy Soens; Thomas Crutchfield; and the Hillis' later joined. The case was dismissed in our local court and appealed to a higher court. The case was finally dismissed in August, 1989. This litigation was a news item around town for some time, and our local attorney cautioned us not to speak to any of the plaintiffs, if at all possible, while the case was still pending. We tried to do that consistent with responding to the FCC.

13. We filed many responses to the FCC during 1988 and 1989 trying to respond to the number of petitions that we have received. The number of petitions, and the number of complainants is huge. All in all, there were over 900 petitions or complaints referred to us by the FCC. Almost all of the complaints were hand-written and some were difficult to read. For example, in 1991 we found out that a fellow whose house we visited, Joe Harrison, we earlier had called "Joe Horn" because we couldn't read his writing. Many of the petitions did not include phone numbers, so we had to look them up in the telephone book. Others were difficult to reach by telephone. Others were just plain not very cooperative. We made mistakes, I'm sure. We didn't think the Ellis', for example, lived within the blanketing contour. From a public relations point of view we made a mistake--we didn't do anything other than offer advice to those who complained about interference to their boosters, or only interference to channel 6, both of which we were told we were not responsible for curing. We have not, however, consciously told the FCC something that is untrue, or that we knew to be untrue.

14. This was not an easy time for the station, even without the problems with blanketing. We were, of course, just learning how to run a radio station. We were also subject to a number of technical problems, mostly with our antenna. We went on the air on October 6, 1988. On October 23, 1988 we had a fire in the antenna bays of the antenna. The antenna bay had to be removed from the

tower, and the old antenna bay sent to the factory for repairs. We operated on reduced power for some time. As we stated to the FCC, both because of the problems with the antenna and to help resolve the FM blanketing complaints. Moreover, even though the antenna was under warranty, the cost of changing antennas was substantial. We discovered in December of 1988 someone shot out a light on the tower and put a bullet in the station's coaxial cable. The coaxial cable had to be repaired because the station couldn't keep power up. We had to operate at reduced power for some time because of the coaxial cable problem. The repaired antenna was mounted on the tower, and the antenna continued to have spectacular arcs, and in May had another fire in an antenna bay. What we thought was a lightning strike shorted out the antenna on May 30, 1989. The station could only operate at 55 percent of authorized power. The antenna was taken down and Shively promised to send us an entirely new four bay antenna. The station functioned with a standby antenna from June until September, 1989, when a brand new antenna was mounted. Using the stand-by antenna, with FCC permission, KOKS could only operated with one-quarter of its authorized ERP--25 kW instead of 100 kW. KOKS operated on an STA at lower power for several months. After some time this antenna started to have arcs as well, especially during rainy weather and heavy fog. During the Spring of 1990 the antenna caught fire again. Again Shively tried to repair the antenna on the tower. When the repaired antenna was installed a Shively engineer supervised the antenna installation, took measurements, and checked all our equipment to see if there

was a problem that was causing the antenna to short out. Arcing became so common that the station would reduce its power (within the FCC limits, and never less than 90 percent of the station's maximum authorized) whenever rain or heavy fog threatened. Finally, after numerous visits, inspections, repairs at the factory, etc., Shively agreed to replace the 4-bay antenna with a 7 bay, which occurred in October, 1991. KOKS had to pay the \$3,500 additional cost. The new 7-bay antenna has exactly the same dimensions and directionality as the old antenna. The proof of performance for this antenna, we were told by Shively, is exactly the same as for the four bay antenna. The only difference is that the power going into the antenna is spread over more bays so that not so much power is going into each bay. The lower power going into the bays also reduces RF and reduces the amount of RF directed toward the ground. This does help reduce FM blanketing.

15. In May of 1989 KOKS was visited by an FCC inspector, Mr. Clark Poole. Mr. Poole was very courteous, and spent some time at the station. Mr. Poole told us that we were not putting our issues/programs list in the public file, as required, and cited the station for that as well as for rule violations concerning EBS. He asked us about our list of donors which should have been in the public file, and which weren't. Mr. Poole explained to me very carefully what an issues/programs list was, and when the list should be put in the public file. He also explained to me about our list of donors. Since his visit I have been very careful to

prepare a programs/issues list and place it in the public file by the 10th day of the next month at the end of each calendar quarter. KOKS has also kept a list of donors, including a list of donors for specific programs, in its public file since that time. Mr. Poole also told us that we shouldn't worry, that FM blanketing interference could be cured with filters. When Mr. Moffit and Mrs. Raines inspected the station in December, 1989 Mrs. Raines made a point of looking at our public file, looked at our programs/issues list and asked to see our list of donors. Mrs. Raines seemed satisfied with what she saw, and the station did not receive any citations. Mr. Moffit also told us that he had never seen any FM blanketing interference that couldn't be cured with filters.

16. In October 1990 KOKS received a letter from the FCC which required us to make home visits to a list of some 105 people who had complained and who are in the blanketing contour. Because of the nature of these visits we asked Charlie Lampe, who is our contract engineer and who runs a TV repair business, to help us in making these visits. This was an expensive job for us. Mr. Lampe's help cost the station \$2,100. Previously, with one exception I'll talk about below, Mr. Lampe wasn't involved in any of the home visits or our response to the blanketing complaints. Since it was clear no matter what our legal responsibilities were that we weren't going to have any peace until we found something that would work for channel 6, we also asked Charlie if he would do some research and see if he could find something that would completely

cure interference to channel 6. The 0-75 filter helped a great deal with some people, but not everyone. After some research Charlie found a company that made a filter cut to take out only 89.5 mHz. Charlie had them send a filter for us to test. The filter seemed to work, so we ordered a number of filters to take along on the home visits. The filters had to be made specially, they were not an off-the-shelf item that we could reorder quickly. We knew we had 105 home visits, and we had enough money in our account, after paying Charlie, to buy 160 filters, which we did.

17. All the home visits were made in February of 1991. I called each home and scheduled a time for a visit. In most instances three people visited the home. Myself, who introduced us and who we were, Mr. Lampe, who did all the work, and Mr. Stewart, who was there most of the time as an observer. From the designation order and elsewhere I know a great deal has been made about the fact that KOKS supposedly limited itself to one filter per household and one set repaired per household. I wasn't aware of any limit on filters, other than the fact we had a limited number of filters available on hand, and saw Charlie use more than one filter in several homes. In some instances we repaired more than one set, like the Adams' home. KOKS also, to my recollection, never refused to put a filter on a radio set that a person complained was receiving interference. The fact of the matter is that very few people ever mentioned interference to their radio receivers, or asked us about them. People were concerned about

their TV sets, specifically how they could receive channel 6. The exceptions who mentioned problems with their radios were: Mrs. Hillis; Mrs. Christian; Mrs. Gray; and, Mrs. Wynn. KOKS did go to each of the homes on the list supplied by the Commission and took care of any interference caused by the station. We did not, and could not, give everyone great reception. TV reception is terrible around here. We did, we believe, take care of interference or picture problems caused by the station, at least in the homes which would cooperate with us.

18. The FCC inspector, Mr. Ramage, also visited some homes and said that we hadn't taken care of problems in those homes. We did visit those homes and take care of any interference caused by KOKS, even in situations where we had no legal responsibility to do so, such as people whose complaints were with blanketing interference to channel 6 or who had boosters or preamplifiers. I'll discuss each of those people.

19. Since Mrs. Smith was one of the first complainants I called Mrs. Smith in early November, 1988. She told me that she was receiving interference on channels 6, 8 and sometimes on 12. On November 10, 1988 Mr. Stewart visited the Smith home and tried a filter on Mrs. Smith's small TV. The filter was not successful and did not take out the noise. I called Mrs. Smith on November 29, 1988 and asked Mrs. Smith if we could try a filter on her outside antenna. Mrs. Smith told us no, because she was getting a new

antenna. I asked her if she would call and let us know when the new antenna was installed and she said she would. She never did call, so I called her again to ask if we could install a filter on her outside antenna. She again said no, this time because her husband didn't want us on the roof. Later, after the lawsuit was filed they told us they didn't want us on the property until the suit was over.

20. We also visited the Smith household on February 18, 1991. Mrs. Hillis was there as well. When we came to the door Mrs. Smith asked us if we were carrying a tape recorder and if we were to leave it outside. We told her we didn't and showed her that we weren't carrying one. During our visit Mrs. Smith kept asking Mr. Lampe a great many questions while he was working. Mrs. Smith is a blunt woman, but her tone was harsh, the questions sounded like jabs. Mr. Lampe found that Mrs. Smith's antenna wasn't hooked up correctly. Mr. Lampe hooked up the antenna and put in new coax from the antenna to the TV. When we left the reception on her TV was as reported to the FCC: channel 12 was coming in well; channels 6,8 and 15 were coming in with snow; and, there was no KOKS audio on any channel. We turned up the sound on channel 6 and heard no KOKS audio. There was no FM blanketing interference on any channel that we looked at. The next day Mrs. Smith called and said that she was getting KOKS audio on channel 8. I called Mr. Lampe and he said that all that Mrs. Smith needed to do was tune in channel 8 properly. I called Mrs. Smith the next

day and told her what Mr. Lampe said and that she would probably see a big improvement if the set were properly tuned. She said the TV was properly tuned and that this showed that the filters did not work.

21. The first time I spoke to Mrs. Hillis about this matter was in November, 1988. She called to complain about KOKS interference to a pay phone in her trailer court. I told her to call the telephone company who would install a filter. She also complained of problems with her reception on channel 6. During November and December of 1988 Mrs. Hillis called several times to complain about her reception on channel 6. At least twice I asked her if we could make an appointment to come to her house to install some filters that might work. Each time I asked she refused, saying, "your filters don't work." The Hillis joined the lawsuit in January, and we were advised by our local counsel not to contact them again. In spite of this advice, I visited the home of Mr. and Mrs. Hillis in March of 1989 with Mr. Lampe. This was the only home which Mr. Lampe visited prior to the visits in February, 1991. Only Mr. Hillis was home. He had a number of complaints about interference to practically everything. His complaints were confusing to me. I let Mr. Lampe handle this, he did most of the talking, I was just an observer. He complained about his TV picture, although he has a satellite, and about the small TV in the back bedroom. He complained about a tape player and the telephone in the kitchen. When we turned on the TV there was no channel 6,

snow on channel 8, and channel 12 was very good. Satellite reception was very good too. Finally Mr. Lampe asked him to take a piece of paper and write down all his complaints, be as specific as possible, and the station would do its best to fix them. Mr. Hillis promised to do this and then never sent a written list of his complaints. I called Mrs. Hillis back several months later and asked for Mr. Hillis' list. We never got it.

22. Mr. Lampe and I visited the Hillis' home again in February, 1991. Both Hillis were there and both were cordial. Mr. Lampe noticed that everything was unhooked from the TV, and the antenna wire was burnt, like it had been struck by lightning. The Hillis said that they had many lightning strikes, and Mr. Lampe replaced the antenna lead wire with coax. Because the wire came in through a window the Hillis' asked that we put a flat antenna lead wire under the window so we didn't have to put a notch in the window or a hole in the wall for the coax. At the Hillis' request Mr. Lampe hooked the antenna lead up to the VCR. While we were there was some noticeable interference that came and went. The Hillis' said that it was from the highway patrol, which is located right across the street. When we left channel 12 had noticeably improved; channel 6 had snow and lines (but no FM blanketing interference); channel 15 was coming in with shadows, and channels 23 and 39 coming in with snow. KOKS was not coming in on the channel 6 audio, and there was no evidence in the picture that I saw of any FM blanketing interference. I don't recall that we were

asked to look at or repair any other television set or any radio.

23. Mrs. Diehl submitted a complaint to the FCC and was called in January, 1989. She told me that her problem was with channel 6. Since we don't have to cure channel 6 problems I told her about a filter. In February, 1991 Mr. Lampe and I visited Mrs. Diehl, who lives in the trailer park right across from the Highway Patrol. Mrs. Diehl didn't mention any other TV set or any radios. Mr. Lampe put a filter on her set and that seemed to improve reception on channel 6. Channel 6 still had no color, however. Channels 12, 15 and 39 were coming in well. Channel 8 was coming in with some snow, but her antenna was pointed the wrong way for channel 8 reception.

24. I went to Ms. Wynn's home by myself after I had made an appointment to see her. In January of 1989 I put a filter on her set which improved everything but channel 6. When KOKS reported to the FCC in January of 1988 that Mrs. Wynn's interference complaint was resolved, I meant that she was receiving all her local TV signals well, but not channel 6, which is not a local signal and which we didn't have to protect from interference. Mrs. Wynn also complained of problems with her radio and I installed a choke filter on the radio too. The filter seemed to improve it. Sometime in the Spring of 1991 Mrs. Wynn called and asked us to pay for a filter that she had bought for her TV. I told her that we would give her a filter instead. I thought that she could return

the filter and get her money back. She seemed agreeable, and I made an appointment to come over. I installed our filter in the splitter going to two TVs. Mrs. Wynn seemed satisfied with her reception when I left, including on channel 6. She didn't ask me to pay for her filter when I visited her home, and, in fact, she didn't mention it at all during the day.

25. I personally went twice to the home of Mrs. Leatha Piper. I visited her home once in January of 1989 when I installed a string filter on her TV. This filter improved reception on channel 15 a great deal, but didn't do much for channel 6. When KOKS reported in January, 1989 that her interference problem was cured, I meant that she got all the channels she was supposed to get well. Once again, channel 6 is not a local channel. I visited the home a second time on April 27, 1989. At that time I installed a 75 ohm FM trap. This filter improved the reception on channels 8, 12 and 15 to the point where it was very good. Channel 6 came in, but not very well. Mrs. Piper was not satisfied because of the continued problems with channel 6, but the reception that I viewed was not effected by FM blanketing interference.

26. I visited the home of Mrs. Libla on February 21, 1989. Mrs. Libla has an antenna and a satellite system. I put a 75 ohm filter on her TV set and the TV reception was much improved. She could even get channel 6, but without channel 6 color. When I left

her home she seemed satisfied. When we reported that Elaine Libes' problems were cured in February, 1989, I meant Elaine Libla. The name on the petition was hard to read. We believed that her problems were cured because she was receiving all her local television signals, and seemed satisfied with the result. In fact, a short time after my visit to her home, Mrs. Libla called me at the station and said that she had discovered that the problem with her TV reception to her satellite was due to the box in their satellite, not KOKS. She said that she had the box fixed and never contacted the station again.

27. Mrs. Joanne Gray signed a petition complaint which we received. I spoke with Mrs. Gray on February 16, 1989 and she said she was having problems with channels 6, 8, and 12. I made an appointment to go to her house and installed a filter. The reception on all her TV channels improved, except for channel 6. Except for channel 6 she seemed satisfied when I left. Again, we reported Mrs. Gray's problems satisfied because she was receiving all her local TV signals, and seemed satisfied with the result. These people, to my knowledge never called the station again, or let us know they were having any other problems.

28. Clyde Freeman signed one of the first complaints we received. The second complaint was from Mrs. Mary Freeman, his wife. We also received another complaint from a Clara Freeman, so there was some confusion. I first went to this home on November 11,

1988 after speaking to them on the telephone the day before. I put a filter on a small TV in a bedroom. There was another TV going in another room but Mr. Freeman did not want me to go into that room. He said he would try the filter and I gave him one to install. He complained of interference to channel 6. The filter helped all channels but channel 6. When we reported that Mr. Freeman's complaint was cured, I meant that all local channels he was supposed to get, excluding channel 6, he got. I talked to Mr. Freeman again in early January of 1989. I told him about the new filters we were trying, the 75 ohm filters, but they hadn't come in yet. We talked about making an appointment to install such a filter as soon as they came in, and he told me that on some days there was no interference, but on some days it was bad. They called the station several times after that but each time they called I could not go to their house that day. We never could agree on a day when they were home and I could get away. After a few times when we couldn't connect they stopped calling the station.

29. I first called the Ellis' on April 7, 1989. From their directions to their home taken on the telephone, I believed that the home was 6 to 8 miles from the KOKS tower site, and well outside of the KOKS blanketing contour. When they called they complained of interference to channel 6. Because I thought they were outside the blanketing contour and only had interference to channel 6, I told them about the 75 ohm trap with which we had some success with in other homes. We learned later that I was mistaken

and that the Ellis' were within the station's blanketing contour. Mr. Lampe and I visited the Ellis home in February of 1991. Mr. Lampe installed two filters, one on the VCR and one on the TV. The filters improved reception on all channels. The Ellis didn't sign our paper because Mr. Ellis said that he wanted to wait and see what happened. Mr. Lampe also fixed their satellite. No mention was made of any other TV than the one Mr. Lampe fixed.

30. Mrs. Marie Christian lives within the KOKS blanketing contour, and first called the station complaining of interference to her channel 6 reception within a few weeks after the station went on the air. When Mrs. Christian first called she told me that she had a booster and a pre-amplifier, as well as a tall tower. I called Mrs. Christian on January 2, 1989 and told her that the 75 ohm filter might help her problem. Mrs. Christian called about once a week for the next four to six months to complain about interference to channel 6. However, her complaints not only dealt with channel 6, she also had both a booster and a pre-amplifier. Mr. Lampe, Mr. Stewart and I later visited her house in February, 1991. At that time she still had a booster, a pre-amplifier, and a tall tower. Mr. Lampe installed a filter on her TV set which improved her reception. Mrs. Christian agreed that channels 6, 12 and 15 were all coming in fine and that there was no KOKS audio on channel 6. Mrs. Christian also told us that she was remodeling and that she was going to move her television sets around, and put them all on one line from the booster. Mr. Lampe showed her the best

way to wire the TV sets together running a line from the booster. He also showed her how one filter would take care of all her TV sets by installing the filter before the splitter. She asked for two more filters for her TV sets, but we did not give them to her. We weren't sure that we had enough filters for everyone and Mrs. Christian had just told us how she was going to run all the sets off one wire and Mr. Lampe had shown her how one filter would work.

31. Mrs. Christian called the station back about three days after our visit to complain that the filter wasn't working. I asked her what the problem was and she said that channel 6 wasn't coming in very well and neither was channel 12. I asked her if she heard any KOKS audio on channel 6, and she said that she didn't know. She said that she didn't think that we were very concerned about restoring her TV reception. I told her that I was trying to find out what the problem was so that I could tell Mr. Lampe about it. I tried to call Mr. Lampe, but he couldn't be reached. I called Mrs. Christian back and asked if we could come over and get the filter to have it tested. I told her that the filters were guaranteed to work, and that we needed to send it back to the factory if it wasn't. Mrs. Christian said that she didn't want us to come to her house, and hung up.

32. Both Garrisons sent in petition complaints. Because of the number of complaints that I dealt with I didn't realize that the Garrisons were part of the same family. I spoke to Willard

Garrison on January 3, 1989 and he complained of interference to channel 6. Because the complaint was only about channel 6 I told him about the 75 ohm channel master filter. The next day I called the same house and spoke to Aileen Garrison. She said that she was having problems primarily with channel 6 but also with channel 15. I asked if I could come to her home and install a filter and she told me to come between 12 and 1 the next day. When I arrived at 12:20 there no one came to the door. They never called back. Mr. Lampe, Mr. Stewart and I visited the Garrison home on February 6, 1991. Mr. Garrison's reception was pretty good when we arrived, but he was complaining so Mr. Lampe installed two filters on his TV set. The picture improved, and all channels were coming in well. Channel 6 was coming in very well, and there was no audio from KOKS on channel 6. Even though it was clear to me that the picture improved with the filters, Mr. Garrison kept saying that the reception was worse, which was clearly not true, and that the filters were messing up his TV. He began to accuse Mr. Lampe of not knowing what he was doing. He was rude to all of us, claiming we were messing with his TV set and that he would sue KOKS. Because he kept claiming the filters made things worse Mr. Stewart asked Mr. Lampe to remove the filters and leave the set just as it was when we came. Mr. Garrison threatened to sue us again when we left. We didn't argue, we just left.

33. Mr. Crutchfield lives within KOKS blanketing contour, and made a complaint in December, 1988. Mr. Stewart first went to Mr.

Crutchfield's home in December, 1988 to see if he could install a string filter to improve reception. The filter did not improve the reception and Mr. Stewart saw that Mr. Crutchfield had both a booster and pre-amplifier. Mr. Crutchfield told Mr. Stewart that KOKS was devaluating his property and that he would file a lawsuit. I first spoke to him on December 30, 1988. At that time he told me that he had a booster and an amplifier. I tried to tell him of the channel master filter that might help his reception, but he began to tell us that he was going to get a lawyer and sue us. I told him of the filter anyway. He later came to the KOKS studio. I told him, again, about a filter he could use and tried to give him one. He wasn't interested in filters, however, he kept talking about how he was going to sue us. He was one of the plaintiffs in the lawsuit filed in January. I later called to tell him of the availability of the 75 ohm filters, but he wasn't interested.

34. Mr. Lampe, Mr. Stewart and I visited Mr. Crutchfield's home again in February, 1991. Once again, he had both a booster and a pre-amplifier and was running both his TV sets from the booster. Mr. Lampe installed a filter before the splitter to take care of both sets. His reception wasn't very good, although channels 12 and 23 were coming in well. There were ghost shadows on some other channels, like channel 15, but there was no FM blanketing interference on any channel. Channel 6 was not coming in well even though no KOKS audio was heard on the channel, and there was no FM blanketing interference on the channel. Mr. Crutchfield asked Mr.

Lampe how he could get channel 6 better, and Mr. Lampe told him that he would have to get a special antenna cut only for channel 6.

35. We last spoke to Mrs. Sandra Durbin in February, 1989.

Mrs. Durbin lives in the Hillis trailer court right across the road from the highway patrol. I went to her house and installed a filter on her TV set. The reception improved a great deal, and Mrs. Durbin seemed pleased with the improvement and told us so. The filter did not bring in channel 6 real well, but she seemed satisfied. She never asked for another filter. She did not mention to me that she was receiving interference on any radios, nor ask me to look at any radios. We never heard from her again, and had no reason to believe that she was dissatisfied. She did say that she often had problems with interference from the highway patrol, especially when they keyed their mikes. When the highway patrol radios were transmitting she would often have black and white lines across her TV.

36. I spoke with Mrs. Kearby in February, 1989 and she said that she was having trouble with the reception of channels 6 and 12. I visited their home a few days later and installed a filter on their TV. The filter improved the reception so that channel 12 came in well, and channel 6 came in, but not so good. The Kearby's were nice to me and seemed satisfied with the improved reception provided by the filter. We never heard from them again directly. When we reported to the FCC that their complaint was cured, I meant

that they could receive all their local channels. However, when Mr. Moffit was inspecting the station in December, 1989 he called me and asked that we call the Kearby home. We did and I asked Mr. Kearby, who answered the phone, if they wanted us to visit their house. He told me that they did not want a house visit again, so I told him to drop by the station to pick up a filter. I don't know if they did. I do know that we never heard from the Kearsbys again. We believed that the Kearsbys were satisfied with our first visit, and Mr. Kearby didn't seem indicate any real problems during our conversation. He declined a home visit, and seemed happy enough to pick up a filter at the station.

37. All of Calvary's submissions to the FCC were filed over my name after I reviewed the material, or were prepared by me personally. There might have been times when I misunderstood someone, and believed that they were satisfied when they were not. We were also dealing with almost a 1000 complaints. We made mistakes in determining who might be within the blanketing contour. KOKS also did not consult legal counsel with respect to some of our submissions to the FCC, including our response to the commission's October 30, 1990 letter. However, neither I nor anyone at KOKS ever knowingly misrepresented something to the Commission.

38. I was also at the station when Mr. Ramage and another FCC employee, Mr. Gusick, inspected the station in February, 1992. Mr. Ramage came to me and asked to see the public affairs file. I

pulled out the file which included our issues/programs lists and placed it, closed, on the desk in front of him. There were a few sheets of announcements from our local social security office sticking out of the back of the file. I don't know, now, why they were in there, probably because I wanted to include mention of those programs the next time I prepared our issues/programs list. Mr. Ramage did not open the file, however. He saw the announcements sticking out and said that " that's wrong, that's a public service announcement." He never looked in the file. I was flustered and disturbed. I had been putting our issues/programs list in the file on the tenth day of the next month after each quarter, just as Mr. Poole had told me to do. I then pulled out one of the Issues/programs list in the file and asked Mr. Ramage if there was anything wrong with it. He looked at it for awhile and said that I hadn't put the date the list was placed in the public file on the list. Mr. Poole never told me that we had to do that, only that the list was supposed to be in the file by a particular date. The lists were in the file then, Mr. Ramage just didn't open the file up to look.

39. Mr. Ramage also asked for a list of our donors for particular programs. I must have been flustered and confused at this point, because I thought he asked for a list of all our donors. When I repeated his question he said that he didn't want a list of all donors, only those supporting particular programs. I told him we didn't have such a list. We don't, but we do have a